

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MONADNOCK CONSTRUCTION, INC.,

Plaintiff,

-against-

WESTCHESTER FIRE INSURANCE
COMPANY,

Defendant.

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WESTCHESTER FIRE INSURANCE
COMPANY,

Third-Party Plaintiff,

-against-

GLASSWALL, LLC, UGO COLOMBO, and
SARA JAYNE KENNEDY COLOMBO,

Third-Party Defendants.

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Case No.: 16 CIV. 00420 (JBW)(VMS)
ECF Case

GLASSWALL, LLC'S
FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rule 34 of the Federal Rules of Civil Procedure, third-party defendant Glasswall, LLC ("Glasswall") requests that third-party plaintiff Westchester Fire Insurance Company ("Westchester") produce the documents requested below in its possession, custody or control within the time provided by the Federal Rules. Glasswall further requests that Westchester mark for identification each document produced and furnish an index of all documents and items which are produced

in response to each specific request together with the written response mandated by FRCP 34(b).

DEFINITIONS AND INSTRUCTIONS

A. The Uniform Definition in Discovery Requests in Local Civil Rule 26.3 is hereby adopted.

B. If a copy of a document is produced rather than the original and the producing party has possession, custody or control, this will be taken to mean a representation that counsel for the producing party has compared the copy with the original and the copy is a true, accurate and complete reproduction of the original.

C. If any document sought by this request has been destroyed or is otherwise unavailable, such document is to be identified by its date, author, recipient, together with a brief summary of its subject matter. The reason for its destruction or unavailability is to be set forth.

D. The documents are to be produced in the form and in the order in which they are maintained and should not in any way be rearranged.

E. If any document is withheld by reason of a claim of privilege, the document is to be identified by date, author, recipient and subject matter. A brief statement of the basis of the claim of privilege is to be furnished.

F. The words "possession or control" mean in the possession or control of you, your agents, attorneys, or any person from whom you might obtain the requested information or document.

G. The word "any" shall include the collective as well as the singular and shall mean "each," "all," and "every" and these terms shall be interchangeable.

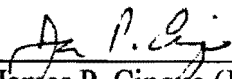
H. This request is to be deemed to be continuing so as to require production of documents and supplemental responses without further request.

DOCUMENT REQUEST

1. All agreements between Westchester on the one hand and Cozen & O'Connor and any other attorneys representing Westchester (the "Attorneys") on the other hand in connection with claims under Bond Numbers K08840295 and K08840258 (the "Bonds").
2. All documents reflecting time spent by the Attorneys, including but not limited to contemporaneous attorney time records.
3. All bills and statements rendered by the Attorneys to Westchester.
4. All documents relating to payments made by Westchester to the Attorneys including but not limited to cancelled checks.
5. All documents generated or received by the Attorneys in connection with any claims under the Bonds, including but not limited to correspondence with Monadnock Construction, Inc. and/or its counsel.
6. To the extent not requested above, all documents relating to or concerning any damages sought by Westchester in this action.

DATED: NEW YORK, NEW YORK
AUGUST 30, 2019

CINQUE & CINQUE, P. C.

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